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1
2 **UNITED STATES DISTRICT COURT**
3 **NORTHERN DISTRICT OF CALIFORNIA**
4 **SAN FRANCISCO DIVISION**

5
6 **IN RE GOOGLE PLAY STORE**
7 **ANTITRUST LITIGATION**

8 THIS DOCUMENT RELATES TO:
9

10 *Epic Games, Inc. v. Google LLC et al.*,
11 Case No. 3:20-cv-05671-JD

12 *In re Google Play Consumer Antitrust*
13 *Litigation*, Case No. 3:20-cv-05761-JD

14 *State of Utah et al. v. Google LLC et al.*,
15 Case No. 3:21-cv-05227-JD

16 *Match Group, LLC et al. v. Google LLC et al.*,
17 Case No. 3:22-cv-02746-JD

18 Case No. 3:21-md-02981-JD

19 **DECLARATION OF JOHN D. BYARS IN**
20 **SUPPORT OF PLAINTIFFS'**
21 **SUPPLEMENTAL BRIEF ON GOOGLE'S**
22 **CHAT PRODUCTION**

23 Judge: Hon. James Donato

26
27
28

1 I, John D. Byars, declare as follows:

2 1. I am an attorney duly admitted to practice in the State of Illinois and before this Court
3 *pro hac vice*. I am a partner at Bartlit Beck LLP, and represent the consumer class in this action. I
4 submit this declaration in support of the Plaintiffs' Supplemental Brief on Google's Chat Production.
5 The contents of this declaration are based on my personal knowledge, including my personal
6 knowledge of the documents cited herein. The facts set forth herein are within my personal knowledge
7 and if called as a witness, I could and would competently testify to them.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced by
9 Google in this litigation bearing the Bates range GOOG-PLAY5-000453593 to GOOG-PLAY5-
10 000453594.

11 3. Attached hereto as **Exhibit 2** is an excerpt of a true and correct copy of the deposition
12 transcript of Sundar Pichai, taken in this litigation on February 27, 2023.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000436389 to GOOG-PLAY5-
15 000436394.

16 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document produced by
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000364738 to GOOG-PLAY5-
18 000364739.

19 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000163578 to GOOG-PLAY5-
21 000163578.

22 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000374365 to GOOG-PLAY5-
24 000374366.

25 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced by
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000374364 to GOOG-PLAY5-
27 000374364.

1 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000482224 to GOOG-PLAY5-
3 000482224.

4 10. Attached hereto as **Exhibit 9** is a true and correct copy of a document produced by
5 Google in this litigation bearing the Bates range GOOG-PLAY5-000161588 to GOOG-PLAY5-
6 000161589.

7 11. Attached hereto as **Exhibit 10** is a true and correct copy of a document produced by
8 Google in this litigation bearing the Bates range GOOG-PLAY5-000362732 to GOOG-PLAY5-
9 000362744.

10 12. Attached hereto as **Exhibit 11** is a true and correct copy of a document produced by
11 Google in this litigation bearing the Bates range GOOG-PLAY5-000477797 to GOOG-PLAY5-
12 000477797.

13 13. Attached hereto as **Exhibit 12** is a true and correct copy of a document produced by
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000160237 to GOOG-PLAY5-
15 000160237.

16 14. Attached hereto as **Exhibit 13** is a true and correct copy of a document produced by
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000389042 to GOOG-PLAY5-
18 000389042.

19 15. Attached hereto as **Exhibit 14** is a true and correct copy of a document produced by
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000389043 to GOOG-PLAY5-
21 000389043.

22 16. Attached hereto as **Exhibit 15** is a true and correct copy of a document produced by
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000168593 to GOOG-PLAY5-
24 000168593.

25 17. Attached hereto as **Exhibit 16** is a true and correct copy of a document produced by
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000389029 to GOOG-PLAY5-
27 000389041.

1 18. Attached hereto as **Exhibit 17** is a true and correct copy of a document produced by
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000168578 to GOOG-PLAY5-
3 000168589.

4 19. Attached hereto as **Exhibit 18** is a true and correct copy of a document produced by
5 Google in this litigation bearing the Bates range GOOG-PLAY5-000383680 to GOOG-PLAY5-
6 000383682.

7 20. Attached hereto as **Exhibit 19** is a true and correct copy of a document produced by
8 Google in this litigation bearing the Bates range GOOG-PLAY5-000164222 to GOOG-PLAY5-
9 000164230.

10 21. Attached hereto as **Exhibit 20** is a true and correct copy of a document produced by
11 Google in this litigation bearing the Bates range GOOG-PLAY5-000383187 to GOOG-PLAY5-
12 000383188.

13 22. Attached hereto as **Exhibit 21** is a true and correct copy of a document produced by
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000382012 to GOOG-PLAY5-
15 000382015.

16 23. Attached hereto as **Exhibit 22** is a true and correct copy of a document produced by
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000473143 to GOOG-PLAY5-
18 000473148.

19 24. Attached hereto as **Exhibit 23** is a true and correct copy of a document produced by
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000389316 to GOOG-PLAY5-
21 000389320.

22 25. Attached hereto as **Exhibit 24** is a true and correct copy of a document produced by
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000364253 to GOOG-PLAY5-
24 000364253.

25 26. Attached hereto as **Exhibit 25** is a true and correct copy of a document produced by
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000383422 to GOOG-PLAY5-
27 000383423.

1 27. Attached hereto as **Exhibit 26** is a true and correct copy of a document produced by
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000366760 to GOOG-PLAY5-
3 000366766.

4 28. Attached hereto as **Exhibit 27** is a true and correct copy of a document produced by
5 Google in this litigation bearing the Bates range GOOG-PLAY5-000163640 to GOOG-PLAY5-
6 000163649.

7 29. Attached hereto as **Exhibit 28** is a true and correct copy of a document produced by
8 Google in this litigation bearing the Bates range GOOG-PLAY5-000433345 to GOOG-PLAY5-
9 000433345.

10 30. Attached hereto as **Exhibit 29** is a true and correct copy of a document produced by
11 Google in this litigation bearing the Bates range GOOG-PLAY5-000394430 to GOOG-PLAY5-
12 000394432.

13 31. Attached hereto as **Exhibit 30** is a true and correct copy of a document produced by
14 Google in this litigation bearing the Bates range GOOG-PLAY5-000423751 to GOOG-PLAY5-
15 000423751.

16 32. Attached hereto as **Exhibit 31** is a true and correct copy of a document produced by
17 Google in this litigation bearing the Bates range GOOG-PLAY5-000408349 to GOOG-PLAY5-
18 000408350.

19 33. Attached hereto as **Exhibit 32** is a true and correct copy of a document produced by
20 Google in this litigation bearing the Bates range GOOG-PLAY5-000375854 to GOOG-PLAY5-
21 000375857.

22 34. Attached hereto as **Exhibit 33** is a true and correct copy of a document produced by
23 Google in this litigation bearing the Bates range GOOG-PLAY5-000383657 to GOOG-PLAY5-
24 000383660.

25 35. Attached hereto as **Exhibit 34** is a true and correct copy of a document produced by
26 Google in this litigation bearing the Bates range GOOG-PLAY5-000495759 to GOOG-PLAY5-
27 000495759.

1 36. Attached hereto as **Exhibit 35** is a true and correct copy of a document produced by
2 Google in this litigation bearing the Bates range GOOG-PLAY5-000495760 to GOOG-PLAY5-
3 000495760.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 14th day of March, 2023 at Chicago, Illinois.

/s/ John D. Byars
John D. Byars

E-FILING ATTESTATION

I, Henry H. Cornillie, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Henry H. Cornillie
Henry H. Cornillie